

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
INVACARE CORPORATION, <i>et al.</i> , ¹)	Case No. 23-90068 (CML)
)	
Reorganized Debtors.)	(Jointly Administered)
)	Re: Docket Nos. 731, 733, 743

**STIPULATION RESOLVING CLAIM OF CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS [CLAIM NO. 10309]**

Invacare Corporation (“Invacare”), one of the above-captioned reorganized debtors and debtors in possession (the “Reorganized Debtors”) and Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless” and together with Invacare, the “Parties”) hereby stipulate and agree as follows (this “Stipulation”):

WHEREAS, on January 31, 2023, the Reorganized Debtors filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532, in the Bankruptcy Court for the Southern District of Texas;

WHEREAS, on March 16, 2023, Verizon Wireless, on behalf of itself and its affiliates including Verizon Business Global LLC (“Verizon Business”), filed a proof of claim which has been designated as Claim No. 10309 (the “Claim”) against Invacare, asserting an unsecured claim in the amount of \$6,279.29;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Invacare Corporation (0965); Freedom Designs, Inc. (4857); and Adaptive Switch Laboratories, Inc. (6470). The corporate headquarters and the mailing address for the Debtors is 1 Invacare Way, Elyria, Ohio 44035.

WHEREAS, on February 2, 2024, the Reorganized Debtors filed the *Fourth Omnibus Objection to Certain Proofs of Claim (Overstated Claims)* [Docket No. 731], objecting to the Claim;

WHEREAS, on February 5, 2024, the Reorganized Debtors filed the *Amended Fourth Omnibus Objection to Certain Proofs of Claim (Overstated Claims)* [Docket No. 733] (the “Objection”), objecting to the Claim;

WHEREAS, on March 1, 2024, Verizon Wireless filed a response to the objection of the Claim [Docket No. 743].

WHEREAS, the Parties desire to enter into this Stipulation to resolve the Claim.

NOW, THEREFORE, it is hereby stipulated and agreed to by and among the Parties as follows:

1. Proof of Claim No. 10309 is hereby allowed as an administrative claim in the amount of \$5,368.48. The allowed claim amount of \$5,368.48 shall be paid within thirty-five days after the date of the entry of this Stipulation.

2. The payment of \$5,368.48 shall be sent to a lock box address supplied by Verizon Wireless’s counsel and not the normal billing address. The Objection is withdrawn as to Proof of Claim No. 10309.

3. The Reorganized Debtors’ claims agent, Epiq Corporate Restructuring, LLC, is authorized and directed to modify the official claims register to comport with this Stipulation.

4. The terms and conditions of this Stipulation shall be immediately effective and enforceable upon its entry.

5. The Court retains sole and exclusive jurisdiction to enforce the provisions of this Stipulation.

STIPULATED AND AGREED ON JUNE 17, 2024:

/s/ Nicholas M. Miller

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